



WISCONSIN

DEPARTMENT OF WORKFORCE DEVELOPMENT

Division of Economic Support
Bureau of Welfare Initiatives

**TO: Economic Support Supervisors
Economic Support Lead Workers
Training Staff
FSET Administrative and Provider Agencies
Child Care Coordinators
W-2 Agencies**

BWSP OPERATIONS MEMO

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**FROM: Stephen M. Dow
Program Implementation Team
Policy Analysis and Program Implementation Section**

**SUBJECT: INCREASING ENROLLMENT IN THE WELFARE-TO-WORK (WtW)
PROGRAM - NEW STRATEGIES**

CROSS REFERENCE: Welfare-to-Work (WtW) Program Guide

EFFECTIVE DATE: Immediately

PURPOSE

The Divisions of Economic (DES) and Workforce Excellence (DWE) wish to encourage you to determine eligibility for Welfare to Work (WtW) of W-2T, CSJ and Trial Job participants immediately before closing the W-2 cash assistance payment placement.

This policy is applicable to Milwaukee agencies and others where there is a formal agreement and/or subcontract between the W-2 agency and their respective Workforce Development Board (WDB) for delivery of WtW services.

In areas where there is no such formal agreement between the W-2 agency and the WDB, this policy should be viewed as an impetus, although not a mandate, to establish such an agreement.

BACKGROUND

WtW was enacted as an amendment to the TANF block grant as part of the 1997 Balanced Budget Act. WtW provides supplemental funding to WDBs to provide services to long term TANF recipients (receiving benefits for 30 months or longer) and noncustodial parents attached to families receiving TANF assistance. WDBs can then subcontract with W-2 agencies and others, as they deem appropriate for service delivery. The WtW program can provide a broad array of job retention and advancement services to employed families.

In Wisconsin, the WtW program has been operational since September 1998. Enrollment has been lower than expected.

DWD wants to make better use of WtW funds to provide job retention and advancement services to W-2 participants in addition to the follow up services provided under the W-2 program.

DISCUSSION

Previously, DWD policy has been that co-enrollment of participants in W-2T, CSJ and Trial Job placements and WtW was not allowed unless the WDB and W-2 agency submitted a request to DWD describing the specific supplemental services to be provided. To date, only the Milwaukee WDB and W-2 agencies have submitted such a request. This policy to not serve current W-2 employment position participants using WtW funds without the formal consent of DWD remains in effect in order to prevent a duplication of services.

However, because WtW requires that persons be a current TANF recipient in order to be determined eligible for WtW services, DWD policy to not serve people in W-2 with WtW funds may have inhibited efforts to use WtW program resources to provide supplemental services to participants once placed into unsubsidized employment.

Anecdotally, it has been reported that many people leaving a W-2 cash placement are still in need of job retention and advancement services beyond those either allowable as part of the follow-up phase of W-2 or included as part of the individual W-2 agencies plan for follow-up. However, participants in the follow-up phase often do not discover their need for, or do not desire post-employment services until after they stop receiving cash payments. At this point, they are no longer eligible for WtW. WtW can be very flexible in meeting post-employment service needs if participants are determined eligible for WtW immediately before they leave a W-2 cash payment placement.

Concurrently, the rate of participants currently moving from W-2T and CSJ placements into unsubsidized employment is increasing as 24-month time limits begin to take effect. WtW could be a valuable resource to supplement services available to these participants if their case closes or during the Case Management Follow-up phase (CMF) of W-2.

NEW POLICY

In order to facilitate a higher rate of WtW enrollments, WtW staff in W-2 agencies are encouraged to work with the FEP to determine WtW eligibility immediately prior to closing a W-2T, CSJ or Trial Job placement or moving the participant into CMF.

The new policy assumes that the FEP and WtW case manager are different staff in the W-2 agency. If this is not the case, one case manager can assume these roles, as is the preferred model by DWD. If there is no formal arrangement between the W-2 agency and the WDB for referrals, the FEP may still, subject to local W-2 agency discretion, implement this policy and seek out a referral agreement at a later point. This policy is also not intended to negate any local agreements or referral mechanisms.

Procedurally, WtW staff seeking to take advantage of this new policy should facilitate a joint review with the FEP and the participant before the W-2 placement is closed. WtW staff should be regularly reviewing placement change data in their area.

Prior to the review, the WtW staff should work with the FEP to review the WtW Eligibility Determination Form (EDF) and do an initial assessment of the participants prescribed barriers to employment for WtW eligibility. This initial assessment should determine if the participant would be potentially eligible for WtW under either the 70% or 30% barrier criteria.

At the review, the FEP will update the Employability Plan (EP) and explain the services available when the W-2 case closes or is moved to CMF. The WtW case manager should also explain the services WtW has to offer. The staff should work together to develop a seamless transition, service plan, and to address continuity of case management issues.

The WtW staff should emphasize that although participation is entirely voluntary, the participant needs to sign and date the EDF form while they are still a "current TANF recipient" in order to take advantage of these services. The participant should be told that they can enroll immediately, or at some point in the next 6 months.

If the participant decides he or she would like to take advantage of the services WtW has to offer anytime within the next six months, the WtW case manager should complete the EDF form. The WtW case manager and the FEP should then include a copy of the signed and dated EDF form in the participants case file for both W-2 and WtW.

The EDF form is good for 6 months from the date signed. Anytime within that 6-month period, the participant can begin WtW services. At that time, s/he becomes an active WtW participant. No information should be entered into the CARES system unless and until the participant becomes active in WtW. Should the participant never begin WtW services, the EDF form expires after 6 months.

HOW DOES THIS NEW POLICY AFFECT NONCUSTODIAL PARENTS?

WtW eligibility currently specifies that noncustodial parents (NCP) must be attached to a family currently receiving TANF assistance, which includes the custodial parent of the child in common being in a W-2T, CSJ or Trial Job placement, or the noncustodial parent being the parent of a child receiving a TANF child-only payment like Kinship Care. Noncustodial parents must also have WtW prescribed barriers to employment.

If the custodial parent signs and dates the EDF form, the NCP of the child in common can be determined eligible for WtW during the 6-month period in which the EDF form is good. The NCP can be determined eligible for and receive WtW services regardless of whether or not the custodial parent is also enrolled in the WtW program. Noncustodial parents need to have and sign their own EDF form (an EDF for the NCP completed by the custodial parent is not valid). Any participation on the part of the noncustodial parent is voluntary, and child support cooperation is required.

WtW case managers should work with FEPs to explain WtW as an option to participants leaving W-2 for unsubsidized employment if it appears likely and reasonable that the noncustodial parent may wish to participate. Staff should not attempt to engage the noncustodial parent in situations where participation would put the custodial parent family's health or safety at risk. Be advised that noncustodial parents participating in the WtW will be able to assume that the custodial parent of their child is probably living in Wisconsin and that they have at some point been a participant in the W-2 program.

Q&A

Q1. My agency already provides follow-up services to people leaving W-2 for unsubsidized employment. What can WtW do that W-2 cannot?

A1. This will vary from agency to agency, although generally, CMF services are limited to case management strategies outlined in section 5.2.2.1 of the W-2 Manual.

As examples, WtW can provide on-the-job payments to employers, short term housing assistance (to prevent eviction), education and training beyond GED and HSED (including vocational training specific to employment), supportive services such as work clothing and tools, on-site job coaching/mentoring and non-medical AODA treatment. Consult the WtW program guide for a more comprehensive list of potentially allowable WtW activities.

Each Workforce Development Area (WDA) has a different plan for WtW services. Consult your supervisor or WtW program manager (if applicable) to learn the WtW services allowable in your area.

Q2. What WtW services can be provided to persons who have exhausted their 24-month time limit and are moving into unsubsidized employment or will have their case closed (i.e., are not moving to a different placement or being granted an extension)?

A2. Similar services as those described above, although WtW funds cannot be used for anything defined as TANF "assistance". As examples, cash grants, living stipends and other on-going monetary expenditures aimed at meeting the participant's basic needs are not allowable.

- Q3. What happens if I cannot get the participant to come in for a face-to-face interview to have him/her sign the EDF?
- A3. Like other documents, the EDF can be mailed to the participant for signature and return. In these circumstances, the WtW program services and parameters should be explained either on the phone or in writing. Participants should also understand the need to return the EDF form quickly so that the "TANF recipient" status is not lost. For example, the form must be signed and returned before the participation period ends.
- Q4. What happens if the EDF expires (6 months after the date of signature) and the participant wants to begin participation in WtW?
- A4. This person will not be eligible for WtW services until WtW eligibility is redetermined, including the requirement that the person be a current TANF recipient.
- Q5. What if my agency does not participate in the WtW program?
- A5. Consult your supervisor to seek establishing an agreement with the WDB to see that the person's needs are met.
- Q6. How does this new policy affect other resources seeking to provide post-employment services (as examples, Community Reinvestment, the proposed Workforce Attachment and Advancement funds)?
- A6. Each W-2 agency has/will have a plan that outlines which post-employment funding sources will fund which services. WtW should, in all cases be considered a "gap filler" and not be used to fund services for which the W-2 agency has already allocated resources. As directed in the response to Question #1, consult your supervisor or WtW program manager to learn about the WtW activities planned for in your agency.
- Q7. Are Caretaker of an Infant (CMC) payments considered TANF payments for the purposes of determining someone eligible for WtW?
- A7. No, because Caretaker of an Infant payments do not "tick the clock" (and are therefore not considered TANF "assistance") unless the child is born more than 10 months after the family is first determined eligible for W-2. In situations where the CMC payment is "ticking the clock", the W-2 program should be the primary avenue for needed services.
- Q8. How can people in FSET access WtW services?
- A8. It is unlikely that many people engaged in FSET are eligible for WtW because they are most likely not current recipients of TANF "assistance." However, in the event that a participant is determined eligible for WtW while a TANF recipient, and subsequently moves to FSET, WtW can supplement the allowable FSET supportive activities.